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Attorney for Plaintiff
Gerardo Hernandez

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

GERARDO HERNANDEZ,

Plaintiff,

vs.

SPRING CHARTER INC. dba VALLEY
MARKET & GAS, et al.,

Defendants.

Case No. 3:19-cv-01479-TSH

**DECLARATION OF PARALEGAL
WHITNEY LAW IN SUPPORT OF
PLAINTIFF'S MOTION FOR
RECOVERY OF HIS ATTORNEYS'
FEES, COSTS, AND LITIGATION
EXPENSES**

Date: March 19, 2020

Time: 10:00 a.m.

Courtroom: G, 15th Floor

Magistrate Judge Thomas S. Hixson

I, Whitney Law, declare as follows:

1. I am a paralegal for the Moore Law Firm, P.C., attorney of record for Plaintiff, Gerardo Hernandez, with a certificate of completion from an American Bar Association approved paralegal program as set forth in California Business & Professions Code § 6450, and I am in compliance with all requirements of § 6450 to qualify as a paralegal under California law, including continuing education. I am over the age of eighteen (18) years and have personal knowledge of the facts contained herein and if called as a witness, could and would testify competently thereto.

DECL. OF PARALEGAL WHITNEY LAW IN SUPPORT OF PLAINTIFF'S FEES MOTION

1 2. I have over ten years of paralegal experience in civil litigation, including seven
2 years specializing in disability access litigation. My hourly rate is based upon my experience,
3 knowledge and qualifications. My responsibilities include conducting legal research, client
4 interviews, researching clients' claims, drafting complaints, drafting default documents and
5 motions for default judgment, drafting fees motions, drafting discovery requests, drafting
6 miscellaneous documents and correspondence, corresponding with opposing parties and
7 counsel, and coordinating the exchange of information with our access consultants.

8 3. My current hourly billable rate is \$150.

9 4. I have spent 26.7 hours on the above-entitled matter, inclusive of this motion,
10 for a total billable amount of \$4,005.00.

11 5. I have reviewed my time entries on the Inventory of Time attached as Exhibit B
12 to the Declaration of Tanya E. Moore, filed herewith, and they correctly reflect the time I have
13 spent on this matter.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16
17 Dated: February 10, 2020

/s/ Whitney Law

Whitney Law

18
19 I attest that the original signature of the person whose electronic signature is shown above is
20 maintained by me, and that his or her concurrence in the filing of this document and attribution
of his or her signature was obtained.

21 /s/ Tanya E. Moore

22 Tanya E. Moore

23 Attorney for Plaintiff,

24 Gerardo Hernandez
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